

ER

94

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

ANDREA CONSTAND,  
Plaintiff,

v.

WILLIAM H. COSBY, JR.,  
Defendant.

CIVIL ACTION NO. 05-1099 - file

Judge Eduardo C. Robreno

(Original Action)

ANDREA CONSTAND,  
Plaintiff,

v.

MARTIN D. SINGER et al.,  
Defendants.

CIVIL ACTION NO. 06-483 - Y

Judge Eduardo C. Robreno

(Consolidated for Discovery)

FILED

DEC 13 2006

MICHAEL S. KUNZ, Clerk  
By JS Dep. Clerk

STIPULATION OF CONFIDENTIALITY

WHEREAS the Court in the original action, *Constand v. Cosby*, Civ. A. No. 05-1099, issued a case management order preserving the confidentiality of certain discovery materials;

WHEREAS the Court consolidated the original action with the second-filed action, *Constand v. Singer et al.*, Civ. A. No. 06-483, for purposes of discovery;

WHEREAS Defendants in the second-filed action, Martin Singer and The National Enquirer, require access to the confidential discovery taken and exchanged in the original action;


IT IS HEREBY STIPULATED and AGREED as follows:

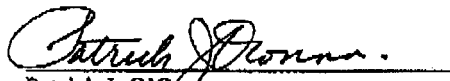
1. The parties in the original action shall make available all discovery taken and exchanged in the original action to the Defendants in the second-filed action, Martin Singer and The National Enquirer, in a mutually convenient manner;

2. The Defendants in the second-filed action, Martin Singer and The National Enquirer, shall maintain and preserve the confidentiality of the discovery they receive and abide by the terms of Court's original order governing confidentiality of the discovery materials; and

3. This Stipulation is made by Plaintiff without prejudice to her right to continue to oppose the confidentiality order.

By the Parties:


  
Dolores M. Troiani  
Bebe/H. Kivitz  
Troiani/Kivitz LLP  
38 N. Waterloo Road  
Devon, PA 19333

  
Patrick J. O'Connor  
George M. Gowen, III  
Cozen O'Connor  
1900 Market Street  
Philadelphia, PA 19103


*Attorneys for Plaintiff Andrea Constand*

Andrew D. Schau  
Patterson Belknap Webb & Tyler, LLP  
1133 Avenue of the Americas  
New York, NY 10036

*Attorneys for Defendant William H. Cosby, Jr.*

  
Nancy J. Gellman  
Conrad O'Brien Gellman & Rohn, P.C.  
1515 Market Street, 16th Floor  
Philadelphia, PA 19102

*Attorneys for Defendant Martin Singer*

  
Paul D. Weller  
Jennifer B. Jordan  
Morgan, Lewis & Bockius LLP  
1701 Market Street  
Philadelphia, PA 19103

*Attorneys for Defendant The National Enquirer*

*mailed  
7.14.06  
See attached*

IT IS SO ORDERED.

DATED: July 12, 2006

By the Court:

Thomas J. Rueter, MJ  
Thomas J. Rueter  
United States District Court